

**Young Conaway Stargatt & Taylor, LLP**

Rockefeller Center  
1270 Avenue of the Americas  
Suite 2210  
New York, NY 10020  
Telephone: (212) 332-8840  
Facsimile: (212) 332-8855  
Matthew B. Lunn  
Justin P. Duda  
Jaclyn C. Marasco

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 10-04468 (SMB)

Plaintiff,

v.

KEN-WEN FAMILY LIMITED PARTNERSHIP;  
KENNETH W. BROWN, in his capacity as a  
General Partner of the Ken-Wen Family Limited  
Partnership; and WENDY BROWN,

Defendants.

**STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION**

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including **November 17, 2020**.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

*[Signature Page Follows]*

Dated: October 14, 2020  
New York, New York

STRADLEY RONON STEVENS &  
YOUNG, LLP

/s/ Deborah A. Reperowitz  
Deborah A. Reperowitz  
100 Park Avenue, Suite 2000  
New York, NY 10017  
Telephone: (212) 812.4138  
Facsimile: (646) 682.7180  
Email: *dreperowitz@stradley.com*

*Mediator*

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

/s/ Jaclyn C. Marasco  
Matthew B. Lunn  
Justin P. Duda  
Jaclyn C. Marasco  
Rockefeller Center  
1270 Avenue of the Americas, Suite 2210  
New York, New York 10020  
Telephone: (212) 332-8840  
Facsimile: (212) 332-8855  
Email: *mlunn@ycst.com*  
*jduda@ycst.com*  
*jmarasco@ycst.com*

*Attorneys for Plaintiff Irving H. Picard,  
Trustee for the Liquidation of Bernard L.  
Madoff Investment Securities LLC*

LAW OFFICE OF MARK S. ROHER,  
P.A.

/s/ Mark S. Roher  
Mark S. Roher  
150 S. Pine Island Road, Suite 300  
Plantation, FL 33324  
Telephone: (954) 353-2200  
Email: *mroher@markroherlaw.com*

*Attorney for Defendant Kenneth W. Brown*

BERNFELD, DEMATTEO & BERNFELD,  
LLP

/s/ David B. Bernfeld  
David B. Bernfeld  
54 N. Broadway, 3rd Floor  
Tarrytown, New York 10591  
Telephone: (212) 661-1661  
Email: *davidbernfeld@bernfeld-dematteo.com*

*Attorney for Defendants Ken-Wen Family  
Limited Partnership and Wendy Brown*